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Counsel for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LING CAI et al.;

Plaintiffs,

v.

ENTERPRISE RENT-A-CAR OF SAN
FRANCISCO, LLC d/b/a “ALAMO,” et al.,

Defendants.

Case No. 2:23-cv-00050-NJK

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
SUBMITTING DISMISSAL PAPERS

[FIRST REQUEST]

Defendants Enterprise Rent-A-Car OF San Francisco, LLC d/b/a “Alamo,” Rental Insurance Services, Inc., ELCO Administrative Services Co. d/b/a “Rental Claims Services” and ACE American Insurance Company (collectively, the “Defendants”), by and through their undersigned counsel, and Plaintiffs Ling Cai, Jing Xu, Z.X. a minor by and through his Natural Parent Jing Xu, and Tammy Harless, as Special Administrator of the Estate of Zhongping Zhou (“Plaintiffs” and collectively with Defendant, the “Parties”), by and through their undersigned counsel, hereby stipulate to extend the deadline to submit dismissal papers by thirty (30) days, from August 30, 2024 to September 30, 2024.

This case has settled. *See* ECF No. 80. On July 15, 2024, this Court entered an order providing that dismissal papers must be filed by August 30, 2024. *See* ECF No. 81. The parties have diligently been working to finalize the papers and submit the dismissal pursuant to the Court’s order. However,

various unavoidable delays have arisen, including those associated with Plaintiffs living in China, and the fact that the agreement contains relatively uncommon terms such as a minor's compromise and probate court approval. As such, the parties stipulate and agree to extend the time to file dismissal papers by thirty (30) days, to September 30, 2024. If the parties are able to submit such papers sooner, they will do so.

This stipulation is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 30th day of August, 2024.

THE 702 FIRM

/s/ Michael C. Kane

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Counsel for Plaintiffs

DATED this 30th day of August, 2024.

GREENBERG TRAURIG, LLP

/s/ Eric W. Swanis

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: September 3, 2024